BROOKHAVEN NATIONAL LABORATORY

Safety & Health Services Division

INDUSTRIAL HYGIENE GROUP

Standard Operating Procedure: Program Procedure

SUBJECT:

Self-Assessment Planning

REVISION
FINAL Rev. 1
DATE
11/01/06

NUMBER

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[Note: SOP numbered changed on 11/04/08. No text changes.]

1.0 Purpose & Scope

This document describes the strategic planning process of the SHSD Industrial Hygiene Group's *Self-Assessment* program. The purpose of the procedure is to establish an effective process to select the topics for self-assessments each year, so that collectively over several years high quality IH programs are in place. The self-assessments are used to validate regulatory compliance and/or to target program improvements.

2.0 Responsibilities

- 2.1 This procedure is administered through the SHSD Industrial Hygiene Group. The IH Group Leader is responsible to:
 - 2.1.1 Create the long range schedule for assessments.
 - 2.1.2 Plan the program areas to be assessed each year.
 - 2.1.3 Assign IH staff to conduct assessments.
 - 2.1.4 Set assessment due dates, and
 - 2.1.5 Track progress and completion of assessments, as provided by the IH professional (assessor) conducting the assessment(s).

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3.0 Definitions

- 3.1 **Assessor:** The person assigned to conduct and document program or field assessment on a topic for which they are a Subject Matter Expert.
- 3.2 **Lead Assessor:** The person assigned to initiate, direct, document, and track a self-assessment to completion.

4.0 Prerequisites none

5.0 Precautions none

- 5.1 **Hazard assessment:** The actual task of planning assessments does not cause significant employee health risks.
- 5.2 **Job Risk Assessment:** Consult the *Job Risk Assessment* <u>IHG-JRA-14</u> for the risk analysis and controls of this SOP.
- 5.3 **Personal Protective Equipment:** Appropriate personal protective equipment is not needed for this procedure.
- 5.4 **Environmental Impact and Waste Disposal:** This sampling does not have adverse impact on the environment or create waste for disposal.

6.0 Procedure

- 6.1 **Equipment:** None
- 6.2 **Planning the assessment calendar:** In the first quarter of each year, the IH Group Leader identifies subject areas to receive self-assessment reviews that fiscal year. All IH subject areas will be assessed on a periodic cycle that factors in regulatory requirements for the frequency of assessments, complexity and scope of each IH program, number of organizations and workers impacted by the program, and the relative risk of the hazard.

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- 6.2.1 The IH Group Leader will identify subject areas that have a regulatory mandate for a review of program documentation and/or implementation compliance. *Attachment 9.1* lists the regulatory and hazard basis for frequency of assessments. The IH Group Leader will target high hazard subject areas and regulatory required assessment for the most frequent assessments and assign low hazard or limited-scope topics less frequent assessments.
- 6.2.2 The IH Group Leader will assign a person to serve as the *Assessor* or *Lead Assessor* for each topic to be reviewed. Ideally, all IH assessments will be combined into a single *IH Multiple Topic Assessment* to minimize the time demands on line organizations and maximize the efficiency of the IH Group's effort.
- 6.2.3 The IH Group Leader informs the SHSD Safety Engineering Group leader of the IH Group schedule to allow combining the assessment contact time with line organizations as much as possible.
- 6.2.4 The IH Group Leader will incorporate ISM and OHSAS 18001 Internal Auditing as much as possible into the SHSD Self Assessment performed on line organizations to:
 - Better integrate the programs with the SBMS management tool
 - Maximize the effectiveness of IH Group staff time in field reviews
 - Lessen the time demand on line organizations.
- 6.3 **Special Emphasis Assessments**: The IH Group Leader, in conjunction with the IH Group Program Administrators, will identify subject areas that will receive an in-depth assessment in a "Collaborative" or "Independent" assessment by the Brookhaven Area Office or other DOE office. The IH Group Leader will assign a SHSD counterpart to interact with the assessment team.
- 6.4 The IH Groups' self-assessments are documented by the following mechanisms:
 - 6.4.1 Assessment for a five year span are selected by the IH Group Leader and documented the SHSD IH Group Self-Assessment Strategic Plan. At the beginning of the fiscal year, the IH Group Leader updates the long range strategic plan for assessments. See Attachment 9.3 IH Group Self-assessment Strategic Plan Template for an acceptable format of the strategic plan. The Strategic Plan will be updated throughout the year as changes in strategy occur.

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- 6.4.2 Each year at the beginning of the fiscal year, the IH Group Leader prepares a list and schedule of subject areas that are to receive self-assessment reviews that fiscal year. See **Attachment 9.2** *IH Group Self-assessment Fiscal Year Plan* for a sample of an acceptable format.
- 6.4.3 During Assessment, the Assessor(s) keep the IH Group Leader apprised of the status using the process described in IH40510.

7.0 Implementation and Training

7.1 **Qualification Criteria:** The IH Group Leader will instruct all *Lead Assessors* in their role relative to this procedure. The formal record of training will be maintained under IH40510.

8.0 References

8.1 Industrial Hygiene Auditing: A Manual for Practice, A. Leibowitz, AIHA Publications, 1994.

9.0 Attachments

- 9.1 Regulatory Required Frequency Of Assessments
- 9.2 BNL IHG Self-assessment Fiscal Year Plan
- 9.3 BNL IHG Self-assessment Strategic Plan

10.0 <u>Documentation</u>

Document Development and Revision Control Tracking					
PREPARED BY:	REVIEWED BY:	APPROVED BY:			
(signature and date on file) R. Selvey Author Date 10/28/03	(signature and date on file) J. Peters Date 10/30/03	(signature and date on file) R. Selvey Group Leader Date 10/31/03			

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ESH Coordinator/ Date:	Work Coordinator/ Date:	SHSD Manager / Date				
none	none	none				
QA Representative / Date:	Training Coordinator / Date:	Filing Code:				
none	none	IH52				
Facility Support Rep. / Date:	Environ. Compliance Rep. / Date:	Effective Date: 10/31/03				
none	none					
ISM Review - Hazard Categorization ☐ High ☐ Moderate ☑ Low/Skill of the craft	Validation: ☐ Formal Walkthrough ☐ Desk Top Review ☐ SME Review Name / Date:	Implementation: Training Completed: Tracked in BTMS Procedure posted on Web: 11/01/06 Hard Copy files updated: 11/01/06				
	Revision Log					
Purpose: Temporary Change Change in Scope Periodic review Clarify/enhance procedural controls						
Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☒ none of the above						
Section/page and Description of change: 3 year review of document, all sections reviewed. Added text to Section 5 on hazard and risk assessments. Significant change to Section 6. Qualification was linked to IIH50510 in Section 7. Update documentation table used in Section 10. The Attachment 9.2 was revised with the most recent version. Removed Attachment 9.4 as it was already in IH50510.						
(signature on file) R. Selvey 11/01/06 SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:				
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Purpose: ☐ Temporary Change ☐ Change in Scope ☐ Periodic review ☐ Clarify/enhance procedural controls						
Changed resulting from: ☐ Environmental impacts ☐ Federal, State and/or Local requirements ☐ Corrective/preventive actions to non-conformances ☒ none of the above						
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(signature/date on file) SME Reviewer/Date:	SME Reviewer/Date:					

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Attachment 9.1

Regulatory Required Frequency of Self-Assessments

Subject areas with **mandated annual reviews** are:

- Chemical Hygiene Plan [29CFR191.1450(e)(4)]
- Confined Space Cancelled Permit Review [29CFR191.146(d)(14)]
- Bloodborne Pathogen Exposure Control Plan [29CFR1910.1030(c.)(1)(v) and (c)(1)(iv)(B)]

Subject areas with regulatory requirements for **periodic reviews** (unspecified frequency) are:

- Respiratory Protection Program [29CFR1910.134 (c.)(1.)(ix.); (c.)(3.); and (l.)(1.), and ANSI Z88.2 (5.3)]
- Lasers [ANSI Z136.1 (1.3.2.8)]

Subject areas with regulatory requirements calling for <u>reviews when there is reason to believe</u> <u>the program needs updating</u> are:

- Asbestos- General Industry [29CFR1910.1001 (f.)(2)]
- Beryllium- CBDPP BNL's equivalent [10CFR850.10(2)(c.) and 10CFR850.40(a)]

Subject areas with regulatory requirements calling for <u>reviews of written exposure control plans</u> <u>triggered by over exposure to OSHA PELs</u> are the following OSHA Regulated Chemicals:

- Acrylonitrile 29CFR1910.1045 6 month revision cycle
- Arsenic 29CFR1910.1018 6 month revision cycle
- Benzene 29CFR1910.1028 revision cycle based on monitoring data
- Butadiene, 1,3- 29CFR1910.1051 12 month revision cycle
- Cadmium 29CFR1910.1027 12 month revision cycle
- Ethylene Oxide 29CFR1910.1047 12 month revision cycle
- Lead 29CFR1910.1025 and 29CFR1926.62 6 month revision cycle
- Vinyl Chloride 29CFR1910.1017 6 month revision cycle

Subject areas <u>without regulatory requirements calling for program reviews</u>, but that the IH Group targets for periodic assessments are:

- Biohazard/Etiologic Agents [DOE N450.7]
- Exhaust Ventilation: HEPA Surveillance testing [ANSI N510; N509]
- Local Exhaust Control Ventilation: [29CFR1910.94]
- Hazard Communication Program [29CFR1910.1200]
- Noise and Hearing Conservation Program [29CFR1910.95]
- Non-ionizing radiation [29CFR1910.95]

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Attachment 9.2 Self-Assessment Fiscal Year Plan Template

	Title (Bold means active for IHG)	Milestone Item	Owner	ATS Due Date				
Spec	Special Emphasis Assessment (Major)							
1.	Topic 1	Final Report	Lead Assessor' Name	MM/DD/YY				
2.	Topic 2	Final Report	Lead Assessor' Name	MM/DD/YY				
3.	Topic 3	Final Report	Lead Assessor' Name	MM/DD/YY				
Mand	Mandated Annual							
4.	Bloodborne Pathogen Exposure Control Plan Review	Final Report	Lead Assessor' Name	MM/DD/YY				
5.	Confined Space Permit Review	Final Report	Lead Assessor' Name	MM/DD/YY				
6.	Chemical Hygi			DD/YY				
BNL	7. Beryllium Use 8. Noise & Hearing DD/YY							
7.	Beryllium Use		1 1 H	DD/YY				
8.	Noise & Hearin	YTATT		DD/YY				
9.	HEPA Filter St Ventilation Topics not being assessed are deleted DD/YY							
10.	Laser	Final Report	Lead Assessor' Name	MM/DD/YY				
11.	Respiratory Protection	Final Report	Lead Assessor' Name	MM/DD/YY				
12.	Asbestos	Final Report	Lead Assessor' Name	MM/DD/YY				
13.	Biohazard- Etiological Agent Use Review	Final Report	Lead Assessor' Name	MM/DD/YY				
14.	HazCom & OSHA Regulated Chemicals	Final Report	Lead Assessor' Name	MM/DD/YY				
15.	Non-lonizing Radiation	Final Report	Lead Assessor' Name	MM/DD/YY				

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Attachment 9.3

Sample: IH Group Self-Assessment Strategic Plan

Title **FY99 FY00 FY01** FY02 FY03 FY04 **FY05** FY06 **FY07 FY08** FY09 **FY10 SBMS** BSA Q2 BSA **Asbestos SBMS** Tech SBMS BSA Q2 BSA Q3 BSA Beryllium Doc BMS 3. Biohazards/Etiologic **SBMS** SAMPLE Agents SBMS **Bloodborne Pathogens** BAO Chemicals-BMS HazCom/ORC BAO SBMS-Q3 **Chemicals- CHP** SBMS BSA BSA Q4 BAO BSA; SBMS BSA 4Q BSA SBMS **Confined Spaces** SBMS BSA Q3 **SBMS** 8. Ergonomics 9. Heat Stress 10 IAQ SBMS **SBMS** Lasers СНО BSA Q2 **BAO SBMS BSA** BAO SBMS SBMS 12 Lead BAO BSA BSA Q4; BSA Q4 BSA **SBMS** Noise and Hearing **BSA** (SBMS Conservation 2nd) BSA BAO Non-Ionizing Radiation &BSA 15 PPE BSA SBMS **SBMS** BSA/BAO BSA: BSA BSA Q4 BSA Q4 BSA **SBMS Respiratory Protection SBMS** ¹⁷ Sanitation 18 Static Magnetic Fields **SBMS SBMS SBMS** BSA/BA **BSA BSA** SBMS Q3 BSA Q4 SBMS Ventilation- Exhaust/ 19 (Summer **HEPA** Project)

Status: Green = Assessment Completed Yellow= SBMS Program Development/Review (Development may be in lieu of Assessment)

Purple/ Orange = Assessment Planned

Orange = driver states "annual"

Blue = driver states "periodic" (IH plan is biennial)

Pink = driver states "when program needs updating" (IH plan is 5 year)